



Alan C. Lloyd, Ph.D.
Agency Secretary

California Regional Water Quality Control Board
North Coast Region
Beverly Wasson, Chairperson

<http://www.waterboards.ca.gov/northcoast>

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Arnold
Schwarzenegger
Governor

October 5, 2005

North Coast Action
drtm@mcn.org

To North Coast Action:

Subject: Comments on Proposed Georgia-Pacific Fort Bragg Sawmill Interim Remedial Measures

File: Georgia-Pacific Fort Bragg Sawmill, 90 West Redwood Avenue, Fort Bragg, CA
Case No. 1NMC462

Thank you for your August 12, 2005 e-mailed comments on work proposed for the Georgia-Pacific Fort Bragg sawmill site. Our responses to your comments are below, following each of your comments (indented and in italics). So you are aware, the following additional documents regarding the proposed interim remedial action work have been submitted by Acton Mickelson Environmental, Inc. (AME) since receipt of your comments:

- 1) *Addendum #2 to Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*, dated August 19, 2005;
- 2) *Response to RWQCB Comments from September 9, 2005 E-Mail Regarding AME's Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*, dated September 22, 2005;
- 3) *Revised Appendix D for Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*, dated September 28, 2005;
- 4) *Stormwater Pollution Prevention Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*, dated September 28, 2005.

These documents are available on our website at
<http://www.waterboards.ca.gov/northcoast/geninfo/gp/gp.html>.

North Coast Action
Fort Bragg, CA 95437
email: drtm@mcn.org
phone: 707-964-3094

California Environmental Protection Agency

Recycled Paper

August 12, 2005

Dear Craig Hunt,

This letter is in response to the recent project update that was presented at a Fort Bragg City Council Meeting August 8, 2005 by Georgia Pacific, Tetra Tech and Acton Mikelson regarding the Georgia Pacific Mill Site. North Coast Action would appreciate a response to the following questions and points below.

- In February 1989, PCBs spilled from a ruptured capacitor at the G-P power plant. Based on mill employees testimony, G-P collected its four remaining power house capacitors, "dumped them into the arms of the main mill pond, then filled and paved over those sections before they could be examined by the federal Environmental Protection Agency" (San Francisco Chronicle article February 16, 2005, direct information from Anna Marie Stenberg who told the story to North Coast Action about an exposed G-P worker that tracked PCB oil through her day care business when he arrived to pick up his small child.)*

Will the buried capacitors be part of the investigation of the mill pond? Will areas that are asphalted over near the mill pond be thoroughly investigated?

The former mill pond areas will be addressed through the additional investigation proposed in the June 8, 2005 Acton Mickelson Environmental, Inc. (AME) *Work Plan for Additional Site Assessment*. Geophysical surveying of the filled in areas of the mill pond is proposed at both the east and west ends of the mill pond. Additional water and soil investigation is also proposed in those areas. The proposed work for those areas is described in sections 5.5.7, Log Pond East Fill Area (pages 46-47) and 5.6.6, Log Pond West Fill Area (pages 55-56) of the work plan. The proposed work is also shown in Figures 9 and 10 of the work plan.

- A report was filed with the Water Quality Control Board showing the main mill pond exceeded allowable levels of cyanide by 10 to 20 percent from the 1980s on. Those levels were exceeded by as much as 400 percent of allowable cyanide as the mill pond burned demolition debris from land fills. Black tailed deer have been seen wading in 12 inches of water in the mill pond (the dam is 31 feet high) and also water fowl using the mill pond. Will there be tissue sampling done on the wildlife using the mill pond to assist in determining what further chemicals to test for? Will the investigation of the mill pond include testing for cyanide?*

Wildlife tissue sampling is not currently planned. However, the need for such sampling will be evaluated as part of the risk assessment process. The chemicals to be analyzed for in the proposed work are based on known and suspected chemicals of potential concern for the site.

Cyanide analysis is included in the mill pond testing (please see section 5.11.1, Pond 8 (pages 67-68), of the *Work Plan for Additional Site Assessment*).

- *North Coast Action gave the Water Quality Control Board and the city of Fort Bragg a map that shows buried transite pipe running almost the entire length of the property, used by G-P for fire suppression on the site. At the meeting, it was unclear whether G-P will be removing the pipe or leaving it in the ground. North Coast Action was told by several G-P employees that a good stretch of the pipe is crumbling. At the public meeting, Julie Raming said that the transite pipe would be removed.*

What method will be used for removing the transite pipe to ensure that asbestos is not released into the air? Will there be an EIR done before the transite pipe is removed?

Additional measures for dust control during the foundation removal work have been included in the revised work plan appendix D.

- *What testing is being done for plumes?*

The potential presence of groundwater contamination plumes has been investigated through groundwater sampling from borings and from monitoring wells. Additional groundwater investigation through borings and the installation of monitoring wells is proposed in the *Work Plan for Additional Site Assessment*.

- *Divers have reported to North Coast Action that while diving in Soldiers Harbor, Glass Beach #2, and #3, they have become ill experiencing symptoms of nausea, skin rashes, and headaches. G-P had cement troughs leading over the bluffs to the ocean where solvents and other hazardous materials were dumped and debris was dumped from the back of trucks over the bluff edge on an ongoing basis. What investigation will be done to acquire benthic indicators from the ocean floor? Will tissue sampling be done on bird life and eggs to assist in determining what concentrations of hazardous materials and waste are on the ocean bottom?*

In the public planning process, many citizens have mentioned kayaking, abalone diving, swimming and other water sports occurring in Soldiers Harbor and at Glass Beach #2 and #3 once the public trail is open along the bluff. What measure will the water board recommend to ensure the public's health in both body contact with the water and eating sea life from the Soldiers Bay and Glass Beaches?

The need for such investigation will be evaluated in the risk assessment process.

- *Bird rookeries and seal haul outs have been spotted off Johnson Point. What measures will be taken to ensure that bird life is not threatened and nesting behavior is not disturbed while excavation and other measures are taken in the investigation process? What measures are being taken to ensure there will be no run off of soils (which may contain hazardous chemicals) into the ocean?*

Additional storm water controls are presented in the *Stormwater Pollution Prevention Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*, submitted by AME on September 28, 2005. This work has been postponed until after this winter. The work will not begin before April 15, 2006.

- *Because the investigation will include back hoeing and other means of soil excavation, North Coast Action has the following questions:*

What precautionary measures are being taken during the investigation of the site in regards to wind blowing contaminated soil into the town of Fort Bragg? In the Work Plan, it is stated that work will stop "if there is a gust of wind 25 miles per hour." It must be noted that once the gust has occurred, the contaminated soil would already be traveling toward the town. Because the town is windward of the G-P site, contaminated soil blowing towards the populated areas, i.e.: shoppers on Main Street, is a concern. 15 mile an hour winds deems "racing weather" for sailboats on the San Francisco Bay.

What precautionary measures are being taken to remove soil from truck tires and off vehicles that have been working on the G-P site before traveling on Main Street and on to Highway 1?

What precautionary measures will be taken to keep soil from running off into the ocean during the wet season?

Additional measures are included in the revised work plan appendix D and in the *Stormwater Pollution Prevention Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measure*.

We would like to receive a response as soon as possible. Thank you for your time.

Sincerely,

Thaïs Mazur

North Coast Action

Loie Rosenkrantz

North Coast Action

David Russell

North Coast Action

California Environmental Protection Agency

We are approving the interim remedial measure work as modified by the additional documents. If you have any additional questions or comments, please contact me at (707) 570-3767, or at CHunt@waterboards.ca.gov.

Sincerely

/ORIGINAL SIGNED BY/

Craig Hunt
Water Resource Control Engineer

100505_CSH_tmk_GPFB_0510_ResponsetoNCA

cc: Ms. Loie Rosenkrantz, 17201 Franklin Road, Fort Bragg, CA 95437



Alan C. Lloyd, Ph.D.
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California Regional Water Quality Control Board
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Arnold
Schwarzenegger
Governor

October 5, 2005

Ms. Carey Knecht
cknecht@berkeley.edu

Dear Ms. Knecht:

Subject: Comments on Proposed Georgia-Pacific Fort Bragg Sawmill Interim Remedial Measures

File: Georgia-Pacific Fort Bragg Sawmill, 90 West Redwood Avenue, Fort Bragg, CA
Case No. 1NMC462

Thank you for your August 12, 2005 e-mailed comments on work proposed for the Georgia-Pacific Fort Bragg sawmill site. Our responses to your comments are below, interspersed with your comments (indented and in italics). So you are aware, the following additional documents regarding the proposed interim remedial action work have been submitted by Acton Mickelson Environmental, Inc. (AME) since receipt of your comments:

- 1) *Addendum #2 to Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*, dated August 19, 2005;
- 2) *Response to RWQCB Comments from September 9, 2005 E-Mail Regarding AME's Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*, dated September 22, 2005;
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August 12, 2005

To: North Coast Regional Water Quality Control Board

From: Carey Knecht

California Environmental Protection Agency

Recycled Paper

Re: Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures, of June 2005 / CDP 3-05

Dear Craig Hunt, Cody Walker, and others:

Thank you for allowing me this opportunity to respond to the “Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures” of June 2005 (“Work Plan”) by the North Coast Regional Water Quality Control Board (“Water Board”). I have several concerns about this cleanup plan.

I am a part-time resident of Caspar, CA, and a frequent visitor to the areas near and around the Fort Bragg mill site – I jog on the Haul Road and would like to use the coastal trail. I write to you from the perspective of one who will be at risk during cleanup activities and as a future user of the site. I am actively involved in Fort Bragg citizen groups who would like to see the cleanup and redevelopment create a healthy, vibrant future for the City of Fort Bragg.

I. This Work Plan Short-Circuits the Safeguards of the Water Board’s Process

Allowing such extensive cleanup to take place as an “interim remedial action,” without the risk assessment or public participation that accompanies the major phase of remediation short-circuits safeguards important to protect public health and the environment. This work plan proposes to remove foundations and excavate impacted soil under 29 buildings and around three areas of geological anomalies. It could even result in “no further action” status on lands to be part of the public land acquisition. This is a very extensive operation. I believe it should occur as conjunction with the Remedial Action Plan, not interim remediation measures. If it is going to occur as an interim action, the following safeguards should be added:

Regional Water Board staff requested changes and additions to the Work Plan in a July 1, 2005 letter to Georgia-Pacific Corporation. Additional documents have been submitted by Acton Mickelson Environmental, Inc. (AME) since your comments, as stated above. The performance of interim remedial measures before site assessment is complete is not atypical for cleanup sites overseen by the Regional Water Board.

Public input should be solicited. *The public should be apprised of the material that is found, and allowed to comment on the plan for dealing with it. Under the existing Work Plan, there will be no opportunity to comment between the testing and interim cleanup phase. As it is, I cannot comment on remediation actions in an informed way. For example, while hauling soil to a landfill may be necessary for certain contaminants, I believe bioremediation or other in-situ methods would be preferable whenever possible, given the potential for contamination to spread when transporting waste. This current Work Plan does not provide sufficient information about what is present and what will be done about it to allow for informed public discussion.*

The proposed interim remedial measures involve excavating debris and contaminated materials. The Regional Water Board does not intend to specify the method of treating or disposing of excavated wastes. Rather, proposed treatment or disposal methods are reviewed for proper waste management, transportation, disposal site, and treatment levels. Transportation to a properly permitted waste disposal facility is one typical method of disposing of wastes and contaminated soils from cleanup sites the Regional Water Board oversees. This Work Plan specifies that excavated materials may be properly disposed of off-site as it is removed. Any on-site treatment will require an additional plan specifying how it will be done. Regional Water Board staff does not intend to direct Georgia-Pacific to not off-haul materials until after public review and comment on analytical results from testing during the interim remedial measures.

***Risk assessment and remediation goal-setting should occur.** This work plan could result in a “no further action” decision on lands to be part of the public land dedication. However, cleanup targets have not been set through the risk assessment process. Nor has the public been allowed to comment on this process or the targets to be used. Although they will be allowed to comment on the “no further action” decision, at that point, the cleanup of those areas will already be more or less finished, and the difficulty of further cleanup may appear more important than the value of a cleaner site.*

As stated in the comment, any proposed issuance of a no further action decision by this agency for this site will be preceded by a public comment period. If cleanup targets are not established through the risk assessment process until after the proposed work is completed, additional work may be required by this agency to issue an unrestricted no further action determination if those cleanup targets are lower than concentrations left in place during the removal work.

It appears that generic cleanup targets will be used. These are not adequate since this site is very unique. The public lands are directly adjacent to the ocean, in an area likely to erode into the ocean (either slowly or suddenly due to an earthquake or tsunami). Just offshore are areas where people fish or pick abalone to eat. In the process, any contaminant that bioaccumulates will enter their body. There are strong winds here that can blow soil inland or to sea. Additionally, numerous chemicals are present on this site. Residents in Fort Bragg have already been exposed to decades of powerhouse emissions and carry any chemical that bioaccumulates as their own personal “body burden.” Similarly, a century of discharges into Soldiers’ Harbor has likely built up a burden in the offshore ecological community (both sediment and in animals). The models that underlie generic targets do not account for any of these facts. Thus, before such an extensive cleanup, and certainly before “no further action” status is issued, a risk assessment should be done. This risk assessment should include a multiple chemical adjustment that considers the risk of being exposed to all chemicals present simultaneously, that incorporates all risk pathways including the shallow groundwater and seafood consumption, and that accounts for the existing chemical burdens of residents and ecological communities.

We will ask Georgia-Pacific to respond to these comments as part of the risk assessment workplan that their consultants are developing.

A qualified, independent monitor should be onsite. A monitor who does not report directly to the responsible party should be present at all times. This could be Water Board staff, a consultant hired by the Water Board, or a consultant hired by the City of Fort Bragg. The City is hiring an independent environmental consultant, but since such extensive cleanup is occurring in what is supposedly the risk assessment phase, they have not yet hired a person. In the absence of independent monitoring, mistakes could occur that would have long term impacts on human health, ecological communities, and water quality. For example, concrete deemed non-hazardous can be crushed and reused on-site. Without an independent observer, the determination that concrete is non-hazardous could be made wrongly – making anyone who later walks on gravel on this property a bit uneasy. The City Engineer may be present, and a certified geologist hired by Georgia-Pacific may be present. However, the Engineer probably has limited experience with brownfield sites, and the certified geologist was not hired specifically to protect the public interest. The cost of an observer (which perhaps could be borne by the responsible party) is miniscule compared to overall cleanup costs. It would be a shame if the lack of an appropriately-qualified, independent observer compromised the public's faith in a multimillion dollar cleanup – or actually endangered their health.

While Regional Water Board staff will attend the work as much as is feasible, Regional Water Board staff will not be present at all times during the work. It is not standard practice for the Regional Water Board to have a representative present at all times during such work. The Regional Water Board will not contract to have someone present during the work.

Therefore, these steps should be postponed until the major cleanup phase. At the CDP hearing, the public was repeatedly told that this was not “remediation,” it was simply necessary for further site assessment activities. However, the removal of soil and debris does not need to be part of site assessment. Already, investigation has occurred by boring through the concrete in the foundations. Therefore, this circumventing of the Water Board process need not occur.

This work plan does include proposals for remediation work. However, the performance of interim remedial measures does not circumvent Regional Water Board processes. The performance of interim remedial measures before site assessment is complete is not atypical for cleanup sites overseen by the Regional Water Board.

II. This Work Plan Does Not Adequately Prevent the Spread of Contamination Off-Site, Endangering Public Health, and the Ecological Community

Air monitoring should include more chemicals. Air monitoring appears to only be monitoring VOCs and petroleum hydrocarbons. This does not include other contaminants attached to sediment that may become airborne, such as arsenic, other metals, or potentially dioxins. This dust could blow off-site, given the strong

winds that do occur. Without monitoring the work area and perimeter for all chemicals of potential concern, the health of workers and the general public is in danger.

More work should detail how the public will be protected from airborne contaminants. Few provisions in this Work Plan address the exposure of the wider Fort Bragg population. For example, the Work Plan states “if a large cloud of dust is generated, personnel will leave the work area and return only after the dust has settled” (B-9). In the meantime, this dust could blow off-site and pose a threat to the larger community. The material included in the Coastal Development Permit states that work will stop when gusts reach 25 mph. But certainly, much slower gusts can also carry dust inland or out into the ocean. By the time a 25 mph gust is measured, it has already occurred.

Airborne contamination poses a risk to public health, ecological communities, and water quality. Airborne contamination is a very important source of pollution spread. Certain areas to be excavated contain levels of arsenic much higher than public health standards allow. This excavation provides a fairly high possibility for arsenic-laden sediment to become airborne. While airborne, people can inhale it. It can then also settle out on people’s cars, baby strollers, lawn chairs, and from there be accidentally ingested. It can settle into the ocean, mill pond, or the nearby creeks and rivers, where it can endanger fish, birds, and many other organisms. The endangered snowy plover is found only a short distance to the north, and if winds carried contamination into its nesting areas, this could result in bird deaths or failure of nests. Therefore, better safeguards are necessary.¹ (¹ The document makes reference to an upcoming permit from the Air Quality Management District, but without that document having been completed, no one, including me or the Water Board, can know whether it will safeguard water quality and public health.)

Stormwater monitoring and controls should be expanded. The Glass Beach properties are immediately on a highly erosive bluff (as stated in the CDP/Mitigated Negative Declaration). No provisions in Appendix D address how stormwater will be prevented from passing onto the bluff and from there to the ocean. I understand that the work will be under an existing stormwater management plan, which I was unable to read (In future work plans, perhaps this could be attached as an appendix to the Work Plan so that it can be easily found by members of the public?). However, since it was not written for these specific circumstances, I do not think it can adequately account for excavation immediately on the edge of the bluff. It should also monitor stormwater runoff for all chemicals of concern.

Work should not occur after winter rains begin. Having observed the failure of stormwater containment systems, I believe that work should not occur after the winter rains begin. A Planning Commissioner, as a representative of the public, raised this point at the Coastal Development Permit (CDP) meeting. She was reassured that they would “probably” finish before the rains begin in November.

Still, she had a provision of the CDP changed to require that the City's engineer would have to give permission for work to continue after that point. However, she did not have available to her this Work Plan, which shows that the work will take four months. Even if work begins as scheduled in the second week of September, half of the work will need to occur during the rainy season. The Coastal Commission also noted the vague wording of this provision in their comment letter on the CDP. Knowing that public officials and members of the public do not want substantial excavation to occur during the rainy season, perhaps the Water Board could ask that this work be postponed. After all, the work is in a highly erosive area directly adjacent to the Pacific Ocean. As stated above, chemicals washing off the site in stormwater could endanger the public in their use of the ocean.

Contaminated stormwater runoff poses a risk to public health, ecological communities, and water quality. *Many of the chemicals present in sediment could endanger the public health if they encountered them while kayaking, abalone picking, scuba diving, or if they accumulated in the tissues of seafood. They will flow over bluffs. Rare or threatened birds are found on the bluff, and some pelagic cormorants are reported to nest there. This bird species returns to its nests each year. Thus, should stormwater pollution carry contaminants into bird nests, it could result in nest failure or death of birds. Other birds, such as oystercatchers are also present nearby. If stormwater carries the dirt into the ocean, it will affect many aquatic organisms including fish, and in that way affect birds and humans that eat seafood.*

BMPs should prevent, not correct, the spread of contamination. *There should be a mechanism for monitoring and enforcement that adequately prevents the spread of contamination. For example, rather than establish safeguards to prevent the spread of soil via wind or truck tires, Appendix D states that "Adjacent public streets shall also be cleaned if necessary when soil material from the site is visible" (D-3). By the time the excavation group notices that soil material on the site is visible on adjacent public streets, some of that visible soil, and much that was unnoticeable, will have already been tracked around the city by people's car tires, their shoes and pets, and other means. More thorough monitoring and safeguards need to be delineated.*

Best Management Practices (BMPs) need to be more specific and enforceable. *The best management practices in Appendix D are sometimes vague; they often offer advice rather than state requirements; and (as noted above with regards to bluff runoff), they are incomplete. For example: "Avoid creating dust when breaking concrete. Prevent dust from entering waterways." (D-5) How? How will this be enforced? "Schedule excavation work for dry weather periods when possible." How is "when possible" to be determined? Most of the Work Plan is quite specific and well-written, and the BMPs should be raised to this level of quality.*

Additional measures for dust control and storm water control are specified in the additional documents that have been submitted by AME (listed above). Also, this work has been postponed until after this winter. The work will not begin before April 15, 2006.

As I stated in my public comments at the Coastal Development Permit, I am very concerned that adequate safeguards do not prevent the spread of contamination and impacts to human or ecological health. Since the City's Mitigated Negative Declaration relies upon the text of the Work Plan, the dangers that remain in the Work Plan call into question whether there really will be no significant impact. Since the Work Plan is still being finalized, it is difficult to know.

Thank you very much for your responsiveness to public input, and for your attention to this lengthy comment letter.

Sincerely,

[submitted by email]

Carey Knecht

We are approving the interim remedial measure work as modified by the additional documents. If you have any additional questions or comments, please contact me at (707) 570-3767, or at CHunt@waterboards.ca.gov.

Sincerely

/ORIGINAL SIGNED BY/

Craig Hunt
Water Resource Control Engineer

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Alan C. Lloyd, Ph.D.
Agency Secretary

California Regional Water Quality Control Board
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Beverly Wasson, Chairperson

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Arnold
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October 5, 2005

Ms. Janie Rezner
17201 Ocean Drive
Ft. Bragg, CA 95437

Dear Ms. Rezner:

Subject: Comments on Proposed Georgia-Pacific Fort Bragg Sawmill Interim Remedial Measures

File: Georgia-Pacific Fort Bragg Sawmill, 90 West Redwood Avenue, Fort Bragg, CA
Case No. 1NMC462

Thank you for your August 12, 2005 e-mailed comments on work proposed for the Georgia-Pacific Fort Bragg sawmill site. They are enclosed with this letter for reference.

In our July 1, 2005 letter to the Georgia-Pacific Corporation, we requested further detail and changes to the Interim Remedial Measures plan regarding assessment of impacted soils and potential spread of contamination. Revisions to this work have been made through the submittal of the following additional documents submitted by Acton Mickelson Environmental, Inc. (AME) since receipt of your comments:

1. *Addendum #2 to Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*, dated August 19, 2005;
2. *Response to RWQCB Comments from September 9, 2005 E-Mail Regarding AME's Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*, dated September 22, 2005;
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These documents are available on our website at
<http://www.waterboards.ca.gov/northcoast/geninfo/gp/gp.html>. As stated within these documents, the work has been postponed until after this winter. The work will not begin before April 15, 2006.

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Additional site investigation has also been proposed in a separate document: *Work Plan for Additional Site Assessment*, June 8, 2005, submitted by AME. We do not foresee a problem in allowing satisfactory interim remedial measures to occur in parallel with additional site assessment.

We are approving the interim remedial measure work as modified by the additional documents. If you have any additional questions or comments, please contact me at (707) 570-3767, or at CHunt@waterboards.ca.gov.

Sincerely

/ORIGINAL SIGNED BY/

Craig Hunt
Water Resource Control Engineer

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Enclosure

Dear Craig,

As a citizen of the Ft. Bragg area, I wish add my voice to the concerns of NCA, regarding the intended investigative process at the GP Mill Site, which seems to be erring on the side of too little investigation, apparently hoping to cart out all the contaminated materials fast without letting folks know what it, without citizen oversight, and with inadequate protection for humans, and birds and animals during this clean-up process. This intended process does not seem to fully appreciate the dangers of contaminated, carcinogenic material to the humans and animals around it and on it and in it, and how easily it can be spread further into the environment. Cancer is on the rise everywhere, including here.

This is a big deal. It is important to do it correctly, finding out exactly what is there--what has been contaminated, including the ocean soil and birds and fish. Let no stone be unturned in this process. This may turn out to be a Super Fund Site . . . and here we've been letting our children play on it's shores and swim in it waters, tourists walk through it. In any case, we need to know what is there in order to protect ourselves, and clean it up . . . while protecting all life around it, whether mammal, fish, or bird, as the clean-up is carried out.

I'm very grateful for NCA, their expertise, and their keen awareness of what needs to be paid attention to in this process.

*Janie Reznor
17201 Ocean Drive
Ft. Bragg, CA*

707 962-9277



Alan C. Lloyd, Ph.D.
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October 5, 2005

Ms. Mary Walsh
P.O. Box 161
Albion, CA 95410

Dear Ms. Walsh:

Subject: Comments on Proposed Georgia-Pacific Fort Bragg Sawmill Interim Remedial Measures

File: Georgia-Pacific Fort Bragg Sawmill, 90 West Redwood Avenue, Fort Bragg, CA
Case No. 1NMC462

Thank you for your August 12, 2005 e-mailed comments on work proposed for the Georgia-Pacific Fort Bragg sawmill site. They are enclosed with this letter for reference.

The need for doing off-site investigation will be evaluated as part of the on-site investigation and the risk assessment process. Additional on-site investigation has been proposed in a separate document: *Work Plan for Additional Site Assessment*, June 8, 2005, submitted by AME. We do not foresee a problem in allowing satisfactory interim remedial measures to occur in parallel with addition site assessment.

In a July 1, 2005 letter, Regional Water Board staff requested additional detail on how the work in these areas will be conducted and how control of materials will be maintained. The Glass Beach areas proposed for debris removal have already been investigated for contamination. Additional testing will be performed as part of the proposed work. Also, revisions to this work, including additional dust and storm water control measures, have been made through the submittal of the following additional documents submitted by Acton Mickelson Environmental, Inc. (AME) since receipt of your comments:

- 1) *Addendum #2 to Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*, dated August 19, 2005;
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Sincerely

/ORIGINAL SIGNED BY/

Craig Hunt
Water Resource Control Engineer

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Enclosure

Mary Walsh
P.O. Box 161
Albion, CA 95410
bella@mcn.org

Re: Workplan For Foundation Removal, Additional Investigation, and Interim Remedial Measures and Addendum #1.

Regarding this matter there are many areas of concern. Primarily, the area is so extensive as to require a full Environmental Impact Statement. The area has historically been subjected to uses whose cumulative impacts must be investigated and weighed. Areas adjacent to the GP site must be included as part of the review. Activities conducted on this site have long impacted the surrounding land and ocean. To disregard this is to betray the people of Fort Bragg, as well as those who use the shore for food and recreation.

A full site evaluation has not been accomplished. Interim Remedial Measures are being proposed before the Remedial Action Plan has been approved. There is insufficient oversight. The City of Fort Bragg has no one advising it expert in environmental consulting and/or toxic evaluation. City staff is not sufficiently educated. Regional Water Quality is not sufficiently educated. It is not enough to rely on the public, or state or local agencies for expertise. This is a very large site with extended historic industrial use. A comprehensive environmental review of the entire site must be done before any foundations have been fragmented into dust to further impact the city and other environs, and before any cement is poured over excavations and into inspection boreholes.

Activities proposed for the Glass Beach areas cannot fail to impact the beach and near shore areas. It will rain eventually. COPC will find their way into the ocean. It is irresponsible to allow debris removal without some prior inspection and categorization of the near shore underwater lands, and tissue sampling of the biota residing there. A baseline for toxic impacts should be established along the entire near shore underwater lands adjacent to the property. To do less would potentially adversely impact the future of Fort Bragg, both in its potential for economic development and its future recreational revenues.

There are too many variables present to leave the matter up to the good will of the applicant. GP has its own agenda, and while Fort Bragg may not be without priority on that agenda, it is undoubtedly without first priority. Fort Bragg, its citizens, resident, migratory, present and those to come, as well as the environment, and not only the 435 plus or minus acres, as well as the so called ecological resources for which the Regional Board has responsibility, must be your first priority.

Thank you for your consideration, Mary Walsh